

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

In re FIRSTENERGY CORP. SECURITIES LITIGATION ) No. 2:20-cv-03785-ALM-KAJ  
\_\_\_\_\_  
This Document Relates To: )  
ALL ACTIONS. )  
\_\_\_\_\_  
)

[PROPOSED] ORDER GRANTING MOTION TO COMPEL DISCOVERY AND  
COMPLIANCE WITH THE COURT'S APRIL 5, 2023 ORDER FROM NON-PARTIES  
SAMUEL C. RANDAZZO AND SUSTAINABILITY FUNDING ALLIANCE OF OHIO, INC.

MURRAY MURPHY MOUL  
+ BASIL LLP  
JOSEPH F. MURRAY (0063373)  
1114 Dublin Road  
Columbus, OH 43215  
Telephone: 614/488-0400  
614/488-0401 (fax)  
murray@mmb.com

Liaison Counsel

ROBBINS GELLER RUDMAN  
& DOWD LLP  
DARREN J. ROBBINS (*pro hac vice*)  
MARK SOLOMON (*pro hac vice*)  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: 619/231-1058  
619/231-7423 (fax)  
darrenr@rgrdlaw.com  
marks@rgrdlaw.com

Lead Counsel for Lead Plaintiff Los Angeles County  
Employees Retirement Association and Plaintiffs  
Amalgamated Bank, City of Irving Supplemental  
Benefit Plan, and Wisconsin Laborers' Pension  
Fund

Having considered the Plaintiffs' Motion to Compel Discovery and Compliance with the Court's April 5, 2023 Order from Non-Parties Samuel C. Randazzo ("Randazzo") and Sustainability Funding Alliance of Ohio, Inc. ("SFAO") submitted by Lead Plaintiff Los Angeles County Employees Retirement Association and Plaintiffs Amalgamated Bank, as Trustee for the LongView LargeCap 500 Index Fund, LongView Quantitative LargeCap Fund, LongView Broad Market 3000 Index Fund, LongView LargeCap 500 Index Fund VEBA, LV LargeCap 1000 Value Index Fund, LongView Quantitative MidCap Fund, LongView Quant LargeCap Equity VEBA Fund and LongView Core Plus Fixed Income Fund, City of Irving Supplemental Benefit Plan, and Wisconsin Laborers' Pension Fund (collectively, the "Class Plaintiffs") and Direct Action Plaintiffs (together, the "Plaintiffs"), and good cause appearing therefore, the Court GRANTS the motion.<sup>1</sup>

It is therefore ORDERED as follows:

1. Non-parties Randazzo and SFAO will search for and produce any documents regarding the \$4.3 million payment within their possession, custody, or control, including for the period from November 21, 2020 to August 31, 2021, to Plaintiffs;
2. Non-parties Randazzo and SFAO will produce such documents and any corresponding privilege log(s) on a rolling basis;
3. Non-parties Randazzo and SFAO will collect Randazzo's 2019 email from its cloud-based sources; and

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<sup>1</sup> The "Direct Action Plaintiffs" are plaintiffs from the related actions captioned *MFS Series Trust I v. FirstEnergy Corp.*, No. 2:21-cv-05839 (S.D. Ohio), and *Brighthouse Funds Trust II – MFS Value Portfolio v. FirstEnergy Corp.*, No. 2:22-cv-00865 (S.D. Ohio).

4. Non-parties Randazzo and SFAO will bear any corresponding costs, as well as the reasonable costs and fees for Plaintiffs' motion.

DATED: \_\_\_\_\_

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THE HONORABLE KIMBERLY A. JOLSON  
UNITED STATES MAGISTRATE JUDGE